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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Kelly Radkowski,

Plaintiff,
v.

Equifax Information Services LLC;
Experian Information Solutions, Inc.;
Clarity Services, Inc.; American
Express, Inc. and Clark County Credit
Union,

Defendants.

Case No.: 2:24-cv-02283

**Discovery Plan and Scheduling
Order Submitted in Compliance
with LR 26-1(b)**

On January 7, 2025, Clark County Credit Union appeared in this case and the Court set a deadline to file a proposed discovery plan and scheduling order by February 21, 2025. Accordingly, Kelly Radkowski and Clark County Credit Union (collectively as the “Parties”), by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties will require 180 days of discovery measured from the date that Clark County Credit Union, filed its answer to Plaintiff's complaint.

DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

- | | |
|---|-------------------|
| 1. Initial disclosures | March 10, 2025 |
| 2. Amend pleadings and add parties .. | April 7, 2025 |
| 3. Expert disclosures (initial): | May 7, 2025 |
| 4. Expert disclosures (rebuttal): | June 6, 2025 |
| 5. Discovery cutoff date: | July 7, 2025 |
| 6. Dispositive motions: | August 5, 2025 |
| 7. Pretrial order | September 4, 2025 |

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order:

Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

Protective Order: The parties may seek to enter a stipulated protective order pursuant to Rule 26(c) prior to producing any confidential documents.

Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be served by sending such documents by email.

Alternative Dispute Resolution Certification: The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and early neutral evaluation. The parties have not reached any stipulations at this stage.

Alternative Forms of Case Disposition Certification: The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01). The parties have not reached any stipulations at this stage.

Electronically Stored Information: The parties have discussed the retention and production of electronic data. The parties agree that service of discovery by electronic means, including sending original electronic files by email or on a cd is sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

1 Electronic evidence conference certification: The parties further intend to
2 present evidence in electronic format to jurors for the purposes of jury deliberations
3 at trial. The parties discussed the presentation of evidence for juror deliberations but
4 did not reach any stipulations as to the method as this early stage.
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6 Dated: February 21, 2025.
7

8 **FREEDOM LAW FIRM**

9 /s/ George Haines

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15 **THE BALL LAW GROUP**

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 2-24-25